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MAY - 6 1993

May 6, 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, D.C. 20554

Re: **Ex parte Contact in CC Docket No. 92-237**
(Administration of the North American Numbering Plan)

Dear Ms. Searcy:

The undersigned parties are concerned about a very time-sensitive matter that has been raised in the above-referenced docket. Specifically, the parties ask that the Commission expeditiously initiate a Rulemaking for the purpose of adopting an alternative to Bellcore's plan to eliminate the use of the digit "1" as a toll call identifier as part of its implementation of "interchangeable" numbering plan area (INPA) codes. Bellcore's proposal would needlessly cost telephone customers more than \$1 Billion, cause substantial consumer confusion and potentially reduce intraLATA long distance service competition.

On January 1, 1995, Bellcore will begin assigning INPA codes

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office codes will then both be of the same "NXX" format, and the prefix '1' will, under Bellcore's plan, be needed to distinguish between these two types of codes. Under INPA, all calls within the home area code, whether local or toll, would be dialed on a 7-digit basis,^{1/} and all calls to a different NPA, whether local or toll, would be dialed on an 11-digit (1-NPA-NXX-XXXX) basis.

In the past, the "1+" convention provided a convenient means for consumers to ascertain whether calling a particular number would entail a toll charge, and also afforded administrators of PBX systems a simple and consistent algorithm for implementing toll restriction in their systems. Under INPA, consumers will not be able to determine the charging status of a particular call unless they look up the code in the local telephone directory.^{2/} Similarly, a PBX will not be able to identify toll calls unless it has been modified to perform this type of screening function and maintains an up-to-date table of local (or toll) central office codes. Neither of these will happen without cost and administrative burden to the PBX manager. AT&T has recently quoted prices for modifying its PBX products at between a few hundred dollars to well over \$10,000, and this does not include the costs of maintaining code tables on an ongoing basis over time. A recent study conducted by the British Office of Telecommunications put the cost of premises equipment modifications to accommodate the forthcoming UK numbering change at nearly £200-million, which translates into more than \$1-billion after accounting for the size differences of the US and the UK.

Moreover, without the digit "1" as a toll identifier, consumers are not likely to know that they could pick a carrier other than the resident LEC to handle intraLATA toll traffic in LATAs in which toll competition has been authorized. As a consequence, intraLATA long distance competition will be adversely affected by Bellcore's INPA plan.

1/ An alternative arrangement, being considered in some states, would require HNPA toll calls to be dialed on an 11-digit basis, using the prefix '1' plus the home area code plus the 7-digit telephone number.

2/ That, of course, assumes that the code will be found there. Codes added after the current directory was printed will not appear until the following year's edition, assuming that all directories are printed annually.

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The Ad Hoc Telecommunications Users Committee has devised an alternative to Bellcore's plan, which was presented to the FCC in the Committee's Comments in CC Docket No. 92-237, that would avoid nearly all of these costs and ongoing burdens. Under the plan described above, which the undersigned parties endorse, it will be possible to retain the 1+ prefix on all toll calls and to exclude it on all local calls, even those which cross an NPA boundary. The present dialing pattern currently in use in the

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Telecommunications Users Committee has urged the Commission to
begin.^{5/}

Respectfully submitted,

Ad Hoc Telecommunications Users
Committee

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^{6/} The New York State Consumer Protection Board is an agency of the State of New York authorized and empowered to represent the interests of New York's consumers before, inter alia, Federal administrative and regulatory agencies. New York Executive Law §553 (3) (d).